

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

JON ARNOLD WOODARD,)	CASE NO: A05-0089 CIV (RRB) <u>UNOPPOSED MOTION and</u> <u>MEMORANDUM FOR EXTENSION FOR</u> <u>TIME TO FILE A RESPONSE TO</u> <u>THE REPLY TO THE § 2254</u> <u>PETITION</u>
Plaintiff,)	
)	
)	
)	
)	
JOHN (CRAIG) TURNBULL)	<hr/>
)	
Defendant.)	
)	

Defendant, Jon A. Woodard, through his undersigned counsel, Hugh W. Fleischer, hereby moves for an extension of the time within which to file a response to the State's reply to the amended § 2254 Petition from January 10, 2007 for a period of seventy days to on or about March 5, 2007.

This motion is based on the fact that the undersigned counsel has three intervening trials, two State Court, one anticipated a two week trial and the other ten days and one Federal, which is anticipated for one week-February 20-27, 2007. Such trials and other required actions necessitate the requested extension.

William H. Hawley, Jr., Assistant Attorney General, State of Alaska, has permitted the undersigned to advise this Court that the State of Alaska does not oppose this motion.

Dated this 10th day of December, 2006.

LAW OFFICES OF HUGH W. FLEISCHER

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 2006, a true copy of JON WOODARD'S foregoing motion & memorandum was electronically sent to:

William H. Hawley, Jr.
Assistant Attorney General
Office of Special Prosecutions and Appeals
310 K. St., Suite 308
Anchorage, AK 99501

S/ Hugh W. Fleischer

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